U.S. Department of the Interior
Bureau of Land Management (BLM)
White River Field Office (WRFO)
220 E Market St
Meeker, CO 81641

DETERMINATION OF NEPA ADEQUACY (DNA)

NUMBER: DOI-BLM-CO-110-2012-0081-DNA

CASEFILE/PROJECT NUMBER: COC75500 - Pipeline Right-of-Way (ROW) and COC75500-01 - Temporary Use Permit

PROJECT NAME: WPX Eight Applications for Permits to Drill (APDs) on Ryan Gulch Unit (RGU) 33-36-198 Well Pad

LEGAL DESCRIPTION: T1S, R98W, Sec.36, NWSE

APPLICANT: WPX

ISSUES AND CONCERNS: None.

DESCRIPTION OF PROPOSED ACTION:
WPX proposes to construct the RGU 33-36-198 well pad and drill eight new wells (see Attachment 1). A total of 12.6 acres of surface disturbance would initially result from the construction of the proposed 500 ft access road (30 ft construction width), 3,400 ft pipeline corridor (60 ft construction width), and 6.9 acre well pad (which includes area needed to install stormwater features). A new 7 inch gas line and two 4 inch water lines would be buried from the pipeline at the RGU 13-36-198 pad, paralleling the County Road 34 (approximately 3,400 ft) to the proposed RGU 33-36-198 pad. A summary of the surface disturbance required to implement the various phases of the proposed development is provided in Table 1. The applicant proposes to store frac water on the existing RGU 13-36-198 well pad and run three 4.5 inch water supply lines 3,920 ft on the surface along the proposed pipeline corridor to the proposed RGU 33-36-198 well pad (see Attachment 2).

WPX anticipates construction of the well pad would begin 9/1/2012 and drilling the eight wells would take approximately 132 days. WPX proposes for the pad to stay in open status for 3 to 6 months after completion operations and then in interim reclamation status for up to 35 years. The well pad would be reclaimed down to only the area needed for production after completion operations, leaving an approximate 1.6 acres of surface disturbance (including access road disturbance) visible for the life of the project. All areas of surface disturbance would be reclaimed after the well is plugged and abandoned.

Table 1. Surface Disturbance Associated with Construction, Production, and Final Abandonment

	Disturbance during Construction Phase (Acres)	Disturbance during Production Phase (Acres)	Disturbance following Abandonment (Acres)
500 ft access road (30 ft corridor width)	0.3	0.2	0
3400 ft pipeline corridor (60 ft corridor width)	4.7	0	0
3,920 ft temporary surface line (with 3,400 ft placed on surface of permanent corridor, leaving 520 ft surface line with a 60 ft potential width of disturbance)	0.7	0	0
well pad	6.9	1.4	0
Total	12.6	1.6	0

Design Features: Site-specific design features are detailed in the operator-submitted Surface Use Plan (SUP). General methods proposed for construction and reclamation are found in the operator-submitted Master Surface Use Plan. Both of these plans are located in the well file and available for review at the WRFO.

Decision to be Made: The BLM will decide whether or not to approve the placement of the permanent pipeline corridor and temporary surface frac line, as well as whether or not to approve the construction of the well pad and the drilling, production, and maintenance activities associated with the eight APDs. The BLM will also decide if any additional mitigation is required to implement the projects.

PLAN CONFORMANCE REVIEW:

Name of Plan: White River Record of Decision and Approved Resource Management Plan (ROD/RMP).

Date Approved: July 1, 1997

Decision Number/Page: Page 2-5

Decision Language: "Make federal oil and gas resources available for leasing and development in a manner that provides reasonable protection for other resource values."

REVIEW OF EXISTING NEPA DOCUMENTS:

List by name and date all existing NEPA documents that cover the Proposed Action.

Name of Document: White River Resource Area Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (PRMP/FEIS).

Date Approved: June 1996

Name of Document: DOI-BLM-CO-110-2009-0035-EA

Date Approved: 6/16/2009

List by name and date any other documentation relevant to the Proposed Action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

Name of Document: WPX Master Surface Use Plan

Date Approved: June 13, 2012

Name of Document: Memoranda of Understanding (MOU) for Implementation of Alternative Mitigation Practices

Date Approved: November 2009

NEPA ADEQUACY CRITERIA:

1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document? If there are differences, can you explain why they are not substantial?

   Yes. Both well pads occur in Pinyon-Juniper woodland habitat. Both sites are also located within the same sixth level watershed and have the same soil type (Rentsac Channery Loam). They are both located in the Square S grazing allotment and have a Visual Resource Management Class III. An eligible cultural resource was identified in the DOI-BLM-CO-110-2009-0035-EA near the RGU 41-1-298 well pad, and mitigation was provided; however, no known cultural resources were identified in surveys for the proposed RGU 33-36-198 well pad. There are no special status animals that inhabit or derive important benefit from the project area in either of the two sites. There are no special status plant species issues or concerns within 600 meters of either site.

2. Is the range of alternatives analyzed in the existing NEPA document appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?

   Two alternatives (Proposed Action and No Action Alternative) were analyzed in DOI-BLM-CO-110-2009-0035-EA, which analyzed the RGU 41-1-298 well pad. No reasons were identified to analyze additional alternatives and these alternatives are considered to be adequate and valid for the Proposed Action.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of

BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new Proposed Action?

The well pad and pipeline connection for the RGU 41-1-298 well pad, analyzed by the BLM-CO-110-2009-0035-EA, was approved in June of 2009 was subject to timing limitations for deer severe winter range. However, in November 2009 a MOU was reached by the, then, Colorado Division of Wildlife, WPX, and BLM that supports Colorado Parks and Wildlife (CPW) research that is designed to better define deer response to applied Best Management Practices (BMPs) and intense, but spatially confined natural gas development. To provide the necessary contrast in experimental design, gas development projects within a pre-defined area of William's Ryan Gulch Unit have been excepted from big game winter timing limitations through year 2013.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new Proposed Action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

   The DOI-BLM-CO-110-2009-0035-EA analyzed and mitigated 10.9 acres of surface disturbance to drill the RGU 41-1-298 multi-well pad and install the associated pipeline connection. Similar in both context and proportion, the Proposed Action is to construct a multi-well pad and install an associated pipeline connection, resulting in 12.6 acres of total surface disturbance. In both cases, all surface disturbances would be completely reclaimed following well abandonment.

5. Is the public involvement and interagency review associated with existing NEPA documents adequate for the current Proposed Action?

   This project was posted on the WRFO's on-line NEPA register on 4/25/2012. As of 6/26/2012, no comments or inquiries regarding this project had been received.

INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by, the WRFO interdisciplinary team on 4/24/2012. A complete list of resource specialists who participated in this review is available upon request from the WRFO. The table below lists resource specialists who provided additional remarks concerning cultural resources and special status species.

Name	Title	Resource	Date
Michael Selle	Archaeologist	Cultural Resources, Native American Religious Concerns	5/1/2012
Ed Hollowed	Wildlife Biologist	Special Status Wildlife Species	5/23/2012
Amber Shanklin	Biological Technician - Plants	Special Status Plant Species	6/11/2012

REMARKS:

Cultural Resources: The proposed well pad location, access route and various pipelines have been covered by all or part of three Class III (100 percent) pedestrian inventories (Conner 1990 compliance dated 4/24/1990, 2005 compliance dated 6/17/2005, Davenport 2011 compliance dated 11/30/2011) which did not identify any cultural resources in the project's Area of Potential Effect. There are no known cultural resources within 1,000 feet of the project that are likely to be impacted. Unless subsurface resources are located it is unlikely the action will impact the regional archaeological database.

Native American Religious Concerns: No Native American Religious Concerns are known in the area, and none have been noted by Northern Ute tribal authorities. Should recommended inventories or future consultations with Tribal authorities reveal the existence of such sensitive properties, appropriate mitigation and/or protection measures may be undertaken.

Paleontological Resources: The proposed well pad is located in an area generally mapped as the Uinta Formation (Tweto 1979) which the BLM, WRFO has classified as a Potential Fossil Yield Classification (PFYC) 5 formation, meaning it is known to produce scientifically noteworthy fossil resources (c f. Armstrong and Wolny 1989). Should it become necessary to excavate into the underlying sedimentary rock formation there is a potential to adversely impact scientifically important fossil resources. Any impacts to fossil resources could result in an irreversible and irretrievable loss of scientific paleontological data in the regional paleontological database.

Threatened and Endangered Wildlife Species: There are no special status animals that inhabit or derive important benefit from the project area. The proposed pad and attendant pipeline are located in a 1960's vintage woodland chaining (subsequently burned) and lie immediately adjacent to a paved county road that accesses a nahcolite mine, numerous gas pads, and a gas processing facility. The proposed project is encompassed by big game severe winter range which is normally subject to imposition of a RMP-approved timing limitation. However, in November 2009 an agreement was reached by the, then, Colorado Division of Wildlife, WPX, and BLM that supports CPW research that is designed to better define deer response to applied BMPs and intense, but spatially confined natural gas development. To provide the necessary contrast in experimental design, gas development projects within a pre-defined area of William's RGU have been excepted from big game winter timing limitations through year 2013. The exception area encompasses about 11 percent of the deer severe winter range encompassed by WPX' leaseholdings in Piceance Basin or about one percent of the total severe winter range available within Game Management Unit 22. This project is within that 7,680-acre exception area.

Threatened and Endangered Plant Species: The Proposed Action is more than 2,000 m to the east of known population of two federally listed threatened plant species, the Dudley Bluffs bladderpod (*Physaria congesta*) and the Dudley Bluffs twinpod (*Physaria obcordata*). The special status plant species are badland or rock outcrop soil associates, and are considered "oil shale endemics" or edaphic (soil-related) endemic species. The bladderpod grows on barren white shale outcrops on tongues of the Green River Formation where it has been exposed along down-cut drainages or windswept ridges. It often grows on level surfaces at the points of ridges or in pinyon-juniper savannah areas where outcrops of the white shale geology has been

exposed. The twinpod also grows on barren white shale outcrops on tongues of the Green River Formation where it is exposed along down-cut drainages, sometimes occurring below, or interspersed with the bladderpod habitats. The Proposed Action for this project occurs below the top of the Black Sulphur Tongue of the Green River Formation and above the Thirteen-mile Creek Tongue of the Green River Formation. A survey completed by WestWater Engineering showed that the proposed well pad and pipeline occur on sandstone-derived soils that are not similar to habitat utilized by the twinpod, and at an elevation of 6,700 feet. The Proposed Action is above the elevation limit for the bladderpod (WestWater Engineering 2011). There are no special status plant species issues or concerns within 600 meters of the Proposed Action.

REFERENCES CITED:

Armstrong, Harley J., and David G. Wolny

1989 Paleontological Resources of Northwest Colorado: A Regional Analysis. Museum of Western Colorado, Grand Junction, Colorado.

Conner, Carl E.

1990 Cultural Resource Inventory of a Proposed New Access Road in Rio Blanco County, Colorado for NATEC Minerals, Inc. Grand River Institute, Grand Junction, Colorado. (90-11-02: SHPO #RB.LM.R101)

2005 Class III Cultural Resource Inventory for Ten Proposed RGU well Locations and Short Access Routes in Rio Blanco County for WPX RMT [Fed. RGU Well Nos. 23-6-297, 13-36-198, 24-29-198, 31-30-198, 31-32-198, 33-32-198, 22-35-198, 44-1-298, 12-10-298D, 42-11-298]. Grand River Institute, Grand Junction, Colorado. (05-11-09: SHPO #RB.LM.NR1666)

Davenport, Barbara

2011 Class III Cultural Resource Inventory for the Proposed Federal RGU #33-36-198 Well Location and Related Linear Route (2800') in Rio Blanco County, Colorado for WPX Field Services. (11-11-36, SHPO #RB.LM.NR2283)

Tweto, Ogden

1979 Geologic Map of Colorado. United States Geologic Survey, Department of the Interior. Reston, Virginia.

WestWater Engineering

2011 WPX RMT Biological Survey Report Well Pad RGU 33-36-198. Grand Junction, CO.

MITIGATION:

The following applicable mitigation and operator committed mitigation from DOI-BLM-CO-110-2009-0035-EA is carried forward:

Operator committed mitigation measures include the following:

1. All access roads and surface-disturbing activities will conform to standards outlined in the BLM Gold Book, Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development.
2. Cleared woodland fuels from the well pad would be stockpiled away from combustible structures and materials used during drilling. Cleared woodland fuels from the access road and pipeline ROWs would be placed back on the ROWs immediately following construction and seeding. Those fuels would be evenly scattered along the ROWs to avoid fuel jackpots. Topsoil would be stockpiled on the edge of the well pad for later reclamation use. Shredded vegetation material would be used for stabilization of the topsoil stockpile. All roadside and well location cut and fill slopes would be revegetated immediately after construction with the seed mixture(s) specified in the Conditions of Approval.
3. All reserve pits will be designed and fenced to BLM specifications. These specifications will be provided to the Operator as part of the Conditions of Approval. Produced waste water will be confined to the pit for a period of 90 days after initial production. During the 90-day period the required waste analysis will be submitted for the Authorized Officer's (AO's) approval, pursuant to Onshore Oil and Gas Order No. 7 (NTL-2B). A permanent steel tank will be installed in the ground next to the production facilities to store produced water before final disposal.
4. The reserve pit will be allowed to evaporate, pumped out and disposed of, and then backfilled. The backfilling of the reserve pit will be done in such a manner that the mud and associated solids will be confined to the pit and not squeezed out and incorporated into the surface materials. There will be a minimum of three ft cover (overburden) on the pit.
5. Chemical pesticides or any other control agent that represents a potential soil, air, or water pollutant will not be utilized for any purpose on public lands without express written authorization from the AO.
6. The Operator or his contractor will notify the BLM 48 hours before starting reclamation work that involves earth-moving equipment and upon completion of restoration measures.

BLM required mitigation measures include the following:

Air Quality

7. All access roads will be maintained according to BLM Manual Section 9113 standards for road shape and drainage features at all times during construction, drilling, completion and production of the wells.
8. All access roads will be treated with water and/or a dust suppressant during construction and drilling activities so that there is not a visible dust trail behind vehicles. All vehicles will abide by company or public speed restrictions during all activities. If water is used as a dust suppressant, there will be no traces of oil or solvents in water. Only water needed

for abating dust will be applied; dust abatement will not be used as a water disposal option under any circumstances.

9. Vehicle speeds will be limited on associated access roads to 15 miles per hour (mph), or another appropriate limit, and applying a BLM-approved dust suppressant during dry periods when dust plumes are visible.
10. Land clearing, grading, earth moving, and excavation activities will be suspended when wind speed exceeds 20 mph or as needed to prevent dust plumes.

Cultural Resources

11. WPX is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
12. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. WPX will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. WPX, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.
13. WPX is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
14. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. WPX will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. WPX, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.
15. Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the AO, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

Invasive and Noxious Weeds

16. The Operator will be required to monitor the Project Area for the life of the project and eradicate all noxious weeds and cheatgrass that occur on-site using materials and methods approved in advance by the AO.
17. Conduct pre-construction surveys for noxious weed infestations within the site boundaries and along access roads. Surveys will be conducted in spring.
18. Construction vehicles and equipment will be cleaned, power-washed, and free of soil and vegetation debris prior to entry and use of access roads to prevent transporting weed seeds.
19. All seed mix, erosion control materials, and reclamation materials will be certified weed free.
20. Revegetated areas will be monitored for at least 3 years following seeding to evaluate the need for supplemental seeding and noxious weed control.
21. The ROW and other disturbed areas will be monitored for noxious weed infestations, and new or expanding populations will be controlled or eradicated for the duration of the construction, operation, and reclamation phases.
22. The presence of Class C weeds in the Project Area requires that the Operator develop and implement management measures to prevent the spread of noxious weeds and install a monitoring system for a minimum of 3 years.
23. Materials and methods will be approved in advance by the AO.

Threatened, Endangered, and Sensitive Plan Species

24. If future raptor inventory surveys document the occurrence of one or more breeding pairs of BLM-sensitive raptors nesting within the project area, future soil-disturbing activities, drilling, well completion, workover and reclamation activities associated with this action will be subject to the White River ROD/RMP-approved No Surface Occupancy (NSO) stipulation NSO-02, which disallows surface occupancy within 0.25 mile of identified functional nests. In addition, disruptive activity (i.e., surface-disturbing, and drilling and completion-related activities) will be disallowed within 0.5 mile of listed and BLM-sensitive species raptor nests from February 1 through August 15 (Timing Limitation-01).

Hazardous and Solid Wastes

25. The Operator will watch for signs of hazardous or solid wastes throughout excavation and operations within the Project Area and, if found, will take the appropriate reporting and mitigation measures to protect the public and workers.
26. The release of any chemical, oil, petroleum product, produced water, or sewage, etc. (regardless of quantity) must be reported by the lease holder, to the Bureau of Land Management – WRFO Hazardous Materials Coordinator at (970) 878-3800.
27. The Operator will comply with all applicable federal laws and regulations existing or hereafter enacted or promulgated. In any event, the Operator will comply with the Toxic Substances Control Act of 1976, as amended (15 USC 2601, et seq.) with regard to any toxic substances that are used, generated by or stored on the ROW or on facilities authorized under this ROW grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 will be reported as required by the CERCLA, Section 102b. A copy of any

report required or requested by any federal agency or state government as a result of a reportable release or spill of any toxic substances will be furnished to the AO concurrent with the filing of the reports to the involved federal agency or state government.

Water Quality

28. Provide for erosion-resistant surface drainage by adding necessary drainage facilities and prior to rain or snow events. When erosion in disturbed areas is anticipated, sediment barriers will be constructed to slow runoff, allow deposition of sediment, and prevent it from leaving the site.
29. If erosion features such as rilling, gullying, piping and mass wasting occur along the pipeline ROW at any time in the future these erosion features will be addressed immediately after observation by contacting the AO and submitting a reclamation plan with BMPs to address the erosion problems.
30. Locate culverts or drainage dips (water breaks) to avoid discharge onto unstable terrain such as headwalls or slumps. Provide adequate spacing of these drainage features to avoid accumulation of water in ditches or road surfaces. Monitor culvert installations to ensure proper placement and adequate armoring of inlets and outlets. Patrol areas susceptible to road or watershed damage during periods of high runoff.
31. Keep road inlet and outlet ditches, catchbasins, and culverts free of obstructions, particularly before and during spring runoff. Routine machine-cleaning of ditches will be kept to a minimum during wet weather. Leave the disturbed area in a condition that provides drainage with no additional maintenance.
32. The new access roads will be built and maintained to BLM Manual Section 9113 standards for road shape and drainage features. Culverts and waterbars will be installed according to 9113 standards and sized for the 10-year storm event with no static head and to pass a 25-year event without failing.
33. For the access road and the pad, the Operator will include via Sundry notice a detailed drainage plan including any BMPs that will be installed for the Operator's stormwater management plan. This plan will be reviewed by the WRFO Hydrologist and approved by the AO before construction. The plan will describe:
    - Construction methods planned for addressing on-site erosion to meet the Operator's stormwater discharge permit requirements.
    - Soil analysis indicating the gravel will not be required to provide an all-weather surface for this access road or design specification and source of gravel to make this an all-weather access road needed for winter drilling.
    - Locations for implementing methods for stabilizing disturbed areas after drilling and proposed maintenance. This description of stabilization methods will include seed mix, seeding rate, and method for mulching and stabilizing (i.e., erosion fabric, tackifier or other method).
    - Culverts, low-water crossings, and/or water dips with the sizing and placement noted.

Water Rights

34. An estimate of the volumes of water that will be used for construction, drilling, completion, fracing, dust abatement, and the final source of drilling waters will be provided to the WRFO hydrologist before drilling begins.

Forest Management

35. All trees removed in the process of construction will be purchased from the BLM. The trees will be cut at a maximum stump height of 6 inches and disposed of by one of the following methods:
36. Purchased trees could be removed from federal land for resale or private use.
37. The stockpiled ground cover will be evenly distributed over the disturbed areas not to exceed 20 percent total ground cover for woody debris. The recommended seed mix to be used on all disturbed areas will be determined by the WRFO. The dirt contractor will be provided with an approved copy of the surface use plan.
38. Vegetative material and topsoil will be stockpiled and used for reclamation. All cut and fill slopes will be revegetated immediately after construction with the seed mixture(s) specified in the Conditions of Approval.
39. A hydro-ax or other mulching type machine could be used to remove the trees. The machines are capable of shredding trees up to 12 inches in diameter and 15 feet tall as well as mowing brush like a conventional brush beater. It generally leaves small branches and pieces of wood from pencil size up to bowling ball size and the mulch is evenly scattered across the surface. This would effectively breakdown the woody fuel and scatters the debris thereby eliminating any hazardous fuel load adjacent to the new road and well pad. If this type of tree removal is used, enough vegetation will be stock piled to adequately cover 20% of the surface for the well pad and stock pile the material adjacent to the top soil stock pile. Additionally, retain enough trees which are limbed and have root wads intact to adequately cover 20% of the surface for the pipeline disturbance. Material brought back onto the pipeline r-o-w should be evenly scattered, so as to not create jackpots of fuel.

Reclamation

40. A Reclamation Status Report will be submitted to the WRFO biannually for all actions that require disturbance of surface soils on BLM-administered lands as a result of the % Action. Actions may include, but are not limited to, well pad and road construction, construction of ancillary facilities, or power line and pipeline construction. The Reclamation Status Report will be submitted by 15 April and 15 August of each calendar year, and will include the well number, API number, legal description, project description (e.g., well pad or pipeline), reclamation status (e.g., interim or final), whether the well pad or pipeline has been re-vegetated and/or re-contoured, date seeded, photos of the reclaimed site, estimate of acres seeded and seeding method (e.g., disk-plowed, drilled, or both). Internal and external review of this report and the process used to acquire the necessary information will be conducted annually, and new information or changes in the reporting process will be incorporated into the report. The Reclamation Status Report will be submitted electronically via email as a Microsoft Excel table to Natural Resource Specialist, Brett Smithers (brett_smithers@blm.gov).
41. In an attempt to track interim and final reclamation of federal actions related to the development of federal mineral resources, the Operator is asked to submit Geographic Information System (GIS) data to the White River Field Office (WRFO) for any post construction (i.e., "as-built") polygon feature that was included in the Application for Permit to Drill (APD) and associated with the Proposed Action. GIS polygon features may include, but are not limited to, constructed access roads, existing roads that were

upgraded, pipeline corridors, and the well pad footprint. Geospatial data will be submitted as ArcView datasets (i.e., shapefiles or features), ArcInfo coverages, or as ArcView compatible data files (e.g., AutoCAD export .dwg files). All AutoCAD files must include the projection information and/or spatial (datum) reference to allow import into a spatially referenced GIS format. The preferred spatial reference for AutoCAD .dwg files is State Plane, Colorado North, NAD83, feet. GIS data will be submitted electronically to BLM, WRFO Natural Resource Specialist, Brett Smithers (brett_smithers@blm.gov; Phone: [970] 878-3818) using the 1983 Geographic Coordinate System (NAD 83 datum). These data will be submitted within 24 hours from the time when construction-related activities have ended for all geographic features associated with the Proposed Action. If the Operator is unable to send the data electronically, the Operator will submit the data on compact disk(s) to:

BLM, White River Field Office
220 East Market Street
Meeker, Colorado 81641
Attn: Brett Smithers

If for any reason the location or orientation of the geographic feature associated with the Proposed Action changes, the Operator is asked to submit updated GIS data to BLM, WRFO within 7 days of the change, and this information should be submitted via Sundry Notice.

Wetlands and Riparian

42. Install and maintain erosion control structures and bank stabilization to minimize potential for sediment runoff into surface waters or drainages.
43. Prohibit storage of hazardous materials, chemicals, fuels, lubricating oils, concrete coating, and refueling activities within 200 feet of wetland or riparian areas.
44. Minimizing soil compaction and furrowing by using mats or wide tire/low ground pressure equipment for construction activities within riparian zones (if necessary).
45. Completing all construction activities in riparian area during no-flow period.
46. Limiting grading, topsoil segregation, and excavation to the area immediately over the trench line and directly within the footprint of the well pad to avoid excessive disruption of soils and the native seed and rootstock within the soils.
47. Performing routine daily inspections on equipment and vehicles to identify leaks and initiate corrective actions.
48. Managing all soil materials such that erosion and sediment transport are minimized.
49. Revegetating disturbed areas with BLM-approved seed mixes as soon as practical following disturbance.

Vegetation

50. If construction/development occurs between April 15 and November 15, the Operator will be required to water or surface access roads to reduce airborne dust and damage to roadside vegetation communities.
51. The Operator will promptly revegetate all disturbed areas not necessary for production, including roadside and well pad cut and fill slopes, with a seed mix approved by the

BLM. This may mean broadcast seeding and hand raking with Native Seed mixture #3 as presented below.

Species (Variety)	Pure Live Seed (PLS) pounds per acre
Western wheatgrass (Rosanna)	2
Bluebunch wheatgrass (Whitmar)	2
Thickspike wheatgrass (Critana)	1
Indian ricegrass (Rimrock)	2
Fourwing saltbush (Wytana)	1
Utah sweetvetch	1
Alternates: Needle-and-thread, globemallow	
TOTAL	**9.0**

52. All seed tags will be submitted to the designated NRS within 24 hours from the time the seeding activities have ended via Sundry Notice. The sundry will include the well or well pad number associated with the seeding activity, the name of the contractor that performed the work, his or her phone number, an estimate of the total acres seeded, and the date the seed was applied.
53. Revegetation will commence immediately after construction and will not be delayed until the following fall. Drill seeding is the preferred method of application. Debris will not be scattered on the pipeline until after seeding operations are completed.
54. The Operator will be responsible for excluding livestock grazing from all reclaimed portions of well pads. To eliminate livestock utilization of reclaimed areas prior to successful reclamation, a barbed wire fence built to BLM specifications will be constructed around all reclaimed portions of the well pad including cut and fill slopes immediately after interim reclamation is concluded (within 2 weeks) unless otherwise instructed by the BLM. A BLM specified cattleguard will be placed at the time of fence construction where the well access road bisects the fence line that surrounds the well pad's disturbance imprint. Once reclaimed plant species are fully established on disturbed sites as determined by the BLM (e.g., Desired Plant Community, Public Land Health Standards), the fence and cattle guard will be completely removed by the applicant after a minimum of two growing seasons. This will allow for reclaimed plant species to establish without grazing pressure from livestock.
55. The Operator will be responsible for achieving a reclamation success rate for interim reclamation and final abandonment (on all disturbed areas associated with the well pad, pipeline, and access road) of sufficient vegetative ground cover from reclaimed plant species within three growing seasons after the application of seed. Additional reclamation efforts will be undertaken at the Operators expense. Reclamation achievement will be evaluated using the Public Land Health Standards that include indicators of rangeland health. Rehabilitation efforts will be repeated if it is concluded that the success rate is below an acceptable level as determined by the BLM.

Wildlife

56. Reserve pits will be appropriately designed, as shown in the BLM Gold Book, Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development to prevent access by persons, wildlife, or livestock. Fencing, netting, or other methods may be required in order to prevent access and mortality of birds and other animals.

57. The Operator will be responsible for implementing mitigation measures that minimize bird injuries or mortality as a result of contact with produced water or other toxic substances in the reserve pit. The most effective measure currently being used includes the use of netting to cover the pit. The use of plastic balls that float on the surface and reduce the area that might be perceived by waterfowl as a place to rest and/or forage has also been used in certain circumstances, with limited results. The use of plastic flagging has proven to be ineffective at deterring use by migratory waterfowl for foraging, resting or as a source of free water, and its use is strongly discouraged. The Operator will notify WRFO Natural Resource Specialist, Brett Smithers via Email (brett_smithers@blm.gov) or by phone ([970] 878-3818) of the method that will be used to prevent impacts to birds two weeks prior to the date when completion activities are expected to begin. In addition, the Operator will submit a Sundry Notice describing the proposed method used to deter use of migratory birds. The BLM-approved method will be applied within 24 hours after completion activities have begun. All lethal and non-lethal events that involve migratory birds will be reported to the Petroleum Engineer Technician immediately.
    - BMPs will be used throughout the life of the project to avoid stormwater pollution. Disturbed areas, except areas reasonably needed for production operations, will be reclaimed as early and as nearly as practicable to their original condition and will be maintained to control dust and minimize erosion and salt loading to nearby surface waters.
    - To help monitor possible impacts to big game and raptors as result of drilling, completion, and well maintenance (i.e., work-over) activities, the Operator will notify the designated NRS the day the drilling rig moves on to the location and inform him or her of the move. In addition, the Operator will notify the designated NRS within 24 hours from the time the drilling rig moves off the location, when the completions rig moves on to the location and when the completion rig moves off the location. Well maintenance operations will also be reported to the designated NRS within 24 hours from the time the work-over rig moves on to the location and when the work-over rig moves off the location.

Access and Transportation

58. Use of a construction yard as the primary parking for personal vehicles.
59. Encouragement and/or arrangement for employees and contractors to carpool to and from the site.
60. Controlling dust along unsurfaced access roads and minimizing the tracking of mud onto paved roads.
61. Post-construction restoration of unsurfaced roads to equal or better than conditions that existed before construction.

Fire and Safety

62. The Operator will be responsible for developing a fire management plan as an integral part of the overall safety plan. In the case of an incident, the Operator will immediately notify the BLM via Craig Interagency Dispatch 970-826-5037. No suppression actions will be taken on naturally ignited fires until meeting with the incident commander for any given incident. Further mitigation of impacts to the fire cycle will be achieved through management practices including:

- Notify the BLM, and affected landowners, of any fires during construction, maintenance, or operation.
- Inform site personnel of fire prevention practices concerning smoking materials, welding, etc., and make hand tools available, including shovels and fire extinguishers, for fire control.
- Furnish all motor vehicles and equipment with fire-extinguishing equipment and stage fire-fighting equipment and water tanks on-site in readily accessible areas.
- Fire suppression equipment will not include the use of heavy equipment such as bulldozers or road graders. The applicant may initially attempt to suppress human caused fires from the result of activities related to construction of proposed project. If fire extinguishers are used to suppress any fire, the applicant and all associated contractors must notify the responding firefighters and Craig Interagency Dispatch Center of such use.
- Construct defensible space as necessary and determine design criteria in coordination with BLM fire staff.
- Perform all welding activities in areas where vegetation and other flammable materials have been removed.
- Redistribute large, woody material salvaged during clearing operations on WRFO administered lands and disperse materials over the portion of the ROW from which the trees and brush were originally removed to meet fire management objectives (not to exceed 20 percent total ground cover for woody debris) and to provide wildlife habitat, seedling protection, and deter vehicular traffic.
- Refer to the 2008 Northwest Colorado Fire Program Area Fire Management Plan for additional mitigation requirements.

Paleontological Resources

63. It is not necessary to monitor low sensitivity Holocene-age alluvium that is thicker than the depth of the proposed surface disturbance.
64. The permittee is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
65. If any paleontological resources are discovered as a result of operations under this authorization, the proponent or any of his agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days.
66. Within 10 days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.

67. If it becomes necessary to excavate into the underlying rock formation to construct the well pad access road(s), bury the well tie pipelines, level the well pads or excavate the reserve/blooie/cuttings pits an approved paleontologist shall be present to monitor work before such excavations begin and throughout the excavation process.

Rangeland Management

68. All roadside and well location cut and fill slopes will be revegetated immediately after construction with the BLM-approved seed mixture(s). Revegetation operations will start immediately following the completion of recontouring/dirt work operations.
69. Reserve pit fencing will comply with BLM specifications as described in the BLM Gold Book, Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development. Reserve pit fence specifications will be included as part of the Conditions of Approval.
70. If construction/development occurs between April 15 and November 15, the Operator will be required to treat surface roads with water to reduce airborne dust and damage to roadside vegetation communities.

Realty

71. Amendments to any existing ROWs will retain terms, conditions, and stipulations of the original grant.

Visual Resource Management

72. All permanent (on-site for 6 months or longer) structures, facilities, and equipment placed on-site will be painted Munsell Soil Color Chart Juniper Green or equivalent within six months of installation.

COMPLIANCE PLAN: On-going compliance inspections and monitoring will be conducted by the BLM White River Field Office staff during and after construction. Specific mitigation developed in this document will be followed. The operator will be notified of compliance related issues in writing, and depending on the nature of the issue(s), will be provided 30 days to resolve such issues.

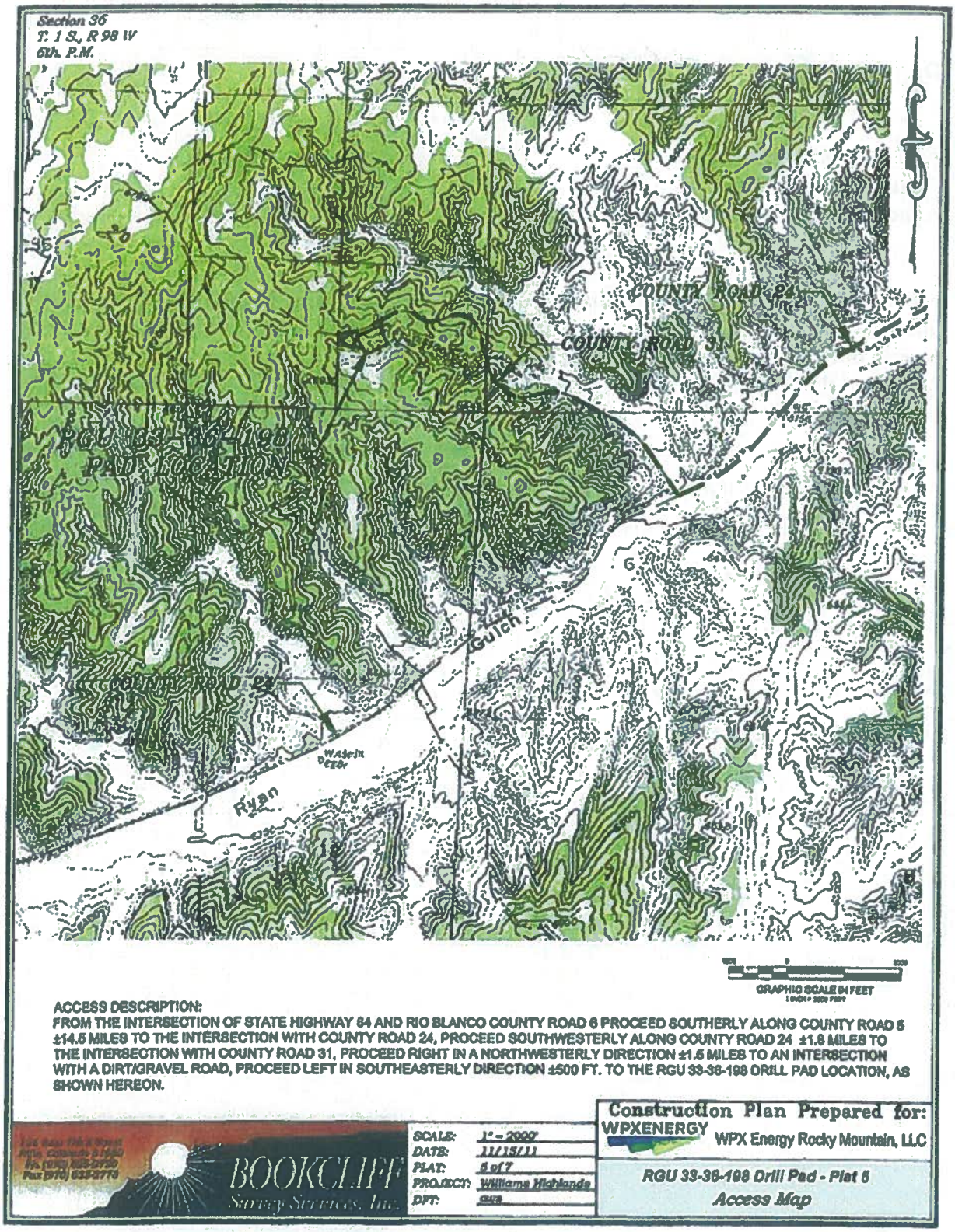
NAME OF PREPARER: Christina J. Barlow

NAME OF ENVIRONMENTAL COORDINATOR: Heather Sauls

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to applicable land use plan and that the NEPA documentation fully covers the Proposed Action and constitutes BLM's compliance with the requirements of the NEPA.

Attachment 1. Access Map



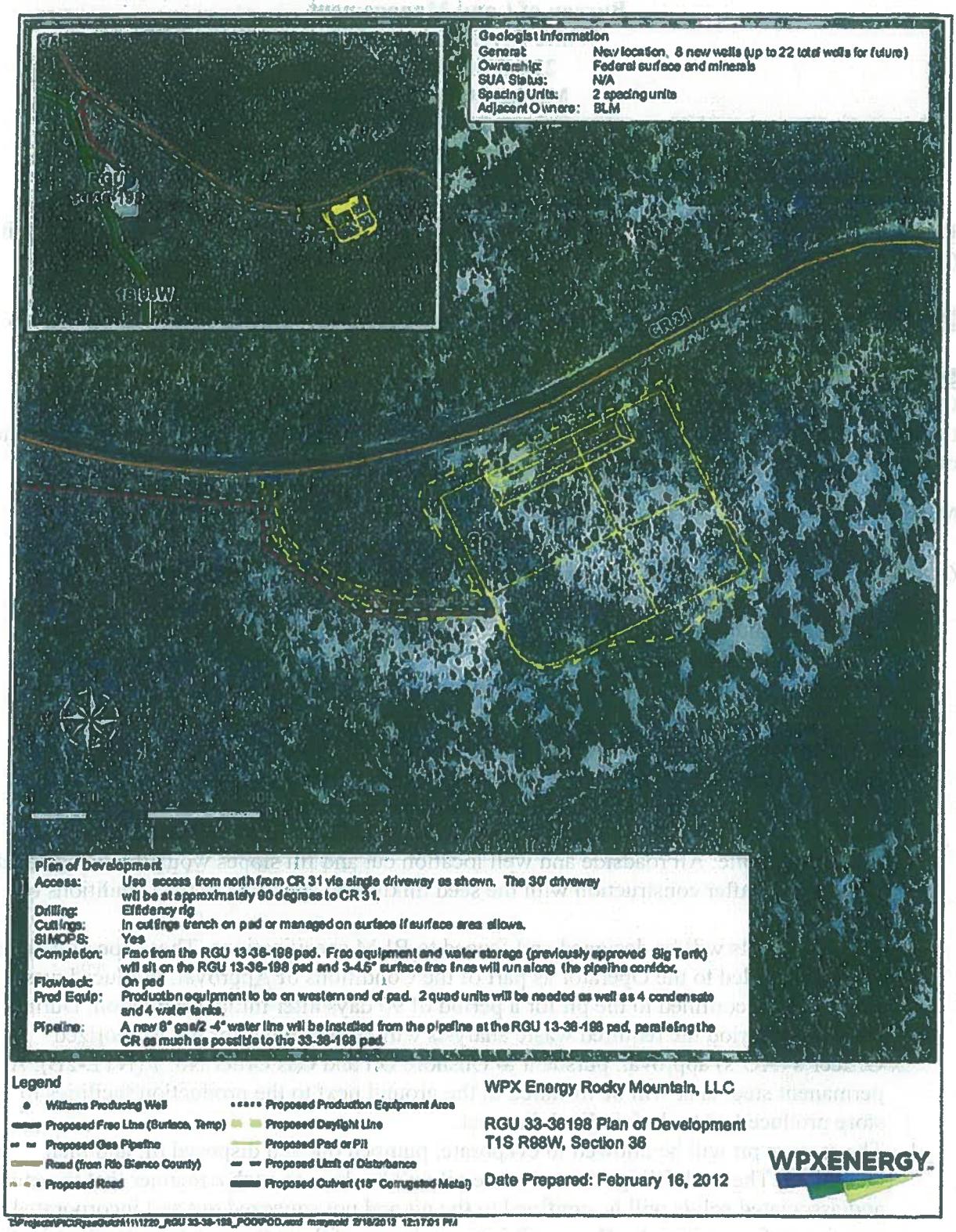
SIGNATURE OF AUTHORIZED OFFICIAL: _____
Field Manager

DATE SIGNED: 07/05/2012

ATTACHMENTS:
Attachment 1. Access Map
Attachment 2. Plan of Development Map

Note: The signed Conclusion in this DNA Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Attachment 2. Plan of Development Map



U.S. Department of the Interior
Bureau of Land Management
White River Field Office
220 E Market St
Meeker, CO 81641

DECISION RECORD

PROJECT NAME: WPX Eight Applications for Permits to Drill (APDs) on Ryan Gulch Unit (RGU) 33-36-198 Well Pad

DETERMINATION OF NEPA ADEQUACY NUMBER: DOI-BLM-CO-2012-0081-DNA

DECISION: It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-2012-0081-DNA, authorizing the placement of the permanent pipeline corridor and temporary surface frac line, as well as the construction and drilling, production, and maintenance of the proposed eight wells on the RGU 33-36-198 well pad.

Mitigation Measures:

Operator committed mitigation measures include the following:

1. All access roads and surface-disturbing activities will conform to standards outlined in the BLM Gold Book, Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development.
2. Cleared woodland fuels from the well pad would be stockpiled away from combustible structures and materials used during drilling. Cleared woodland fuels from the access road and pipeline ROWs would be placed back on the ROWs immediately following construction and seeding. Those fuels would be evenly scattered along the ROWs to avoid fuel jackpots. Topsoil would be stockpiled on the edge of the well pad for later reclamation use. Shredded vegetation material would be used for stabilization of the topsoil stockpile. All roadside and well location cut and fill slopes would be revegetated immediately after construction with the seed mixture(s) specified in the Conditions of Approval.
3. All reserve pits will be designed and fenced to BLM specifications. These specifications will be provided to the Operator as part of the Conditions of Approval. Produced waste water will be confined to the pit for a period of 90 days after initial production. During the 90-day period the required waste analysis will be submitted for the Authorized Officer's (AO's) approval, pursuant to Onshore Oil and Gas Order No. 7 (NTL-2B). A permanent steel tank will be installed in the ground next to the production facilities to store produced water before final disposal.
4. The reserve pit will be allowed to evaporate, pumped out and disposed of, and then backfilled. The backfilling of the reserve pit will be done in such a manner that the mud and associated solids will be confined to the pit and not squeezed out and incorporated into the surface materials. There will be a minimum of three ft cover (overburden) on the pit.

5. Chemical pesticides or any other control agent that represents a potential soil, air, or water pollutant will not be utilized for any purpose on public lands without express written authorization from the AO.
6. The Operator or his contractor will notify the BLM 48 hours before starting reclamation work that involves earth-moving equipment and upon completion of restoration measures.

BLM required mitigation measures include the following:

Air Quality

7. All access roads will be maintained according to BLM Manual Section 9113 standards for road shape and drainage features at all times during construction, drilling, completion and production of the wells.
8. All access roads will be treated with water and/or a dust suppressant during construction and drilling activities so that there is not a visible dust trail behind vehicles. All vehicles will abide by company or public speed restrictions during all activities. If water is used as a dust suppressant, there will be no traces of oil or solvents in water. Only water needed for abating dust will be applied; dust abatement will not be used as a water disposal option under any circumstances.
9. Vehicle speeds will be limited on associated access roads to 15 miles per hour (mph), or another appropriate limit, and applying a BLM-approved dust suppressant during dry periods when dust plumes are visible.
10. Land clearing, grading, earth moving, and excavation activities will be suspended when wind speed exceeds 20 mph or as needed to prevent dust plumes.

Cultural Resources

11. WPX is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
12. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. WPX will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. WPX, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.
13. WPX is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
14. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until

approved by the AO. WPX will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. WPX, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.

15. Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the AO, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

Invasive and Noxious Weeds

16. The Operator will be required to monitor the Project Area for the life of the project and eradicate all noxious weeds and cheatgrass that occur on-site using materials and methods approved in advance by the AO.
17. Conduct pre-construction surveys for noxious weed infestations within the site boundaries and along access roads. Surveys will be conducted in spring.
18. Construction vehicles and equipment will be cleaned, power-washed, and free of soil and vegetation debris prior to entry and use of access roads to prevent transporting weed seeds.
19. All seed mix, erosion control materials, and reclamation materials will be certified weed free.
20. Revegetated areas will be monitored for at least 3 years following seeding to evaluate the need for supplemental seeding and noxious weed control.
21. The ROW and other disturbed areas will be monitored for noxious weed infestations, and new or expanding populations will be controlled or eradicated for the duration of the construction, operation, and reclamation phases.
22. The presence of Class C weeds in the Project Area requires that the Operator develop and implement management measures to prevent the spread of noxious weeds and install a monitoring system for a minimum of 3 years.
23. Materials and methods will be approved in advance by the AO.

Threatened, Endangered, and Sensitive Plan Species

24. If future raptor inventory surveys document the occurrence of one or more breeding pairs of BLM-sensitive raptors nesting within the project area, future soil-disturbing activities, drilling, well completion, workover and reclamation activities associated with this action will be subject to the White River ROD/RMP-approved No Surface Occupancy (NSO) stipulation NSO-02, which disallows surface occupancy within 0.25 mile of identified functional nests. In addition, disruptive activity (i.e., surface-disturbing, and drilling and completion-related activities) will be disallowed within 0.5 mile of listed and BLM-sensitive species raptor nests from February 1 through August 15 (Timing Limitation-01).

Hazardous and Solid Wastes

25. The Operator will watch for signs of hazardous or solid wastes throughout excavation and operations within the Project Area and, if found, will take the appropriate reporting and mitigation measures to protect the public and workers.
26. The release of any chemical, oil, petroleum product, produced water, or sewage, etc. (regardless of quantity) must be reported by the lease holder, to the Bureau of Land Management – WRFO Hazardous Materials Coordinator at (970) 878-3800.
27. The Operator will comply with all applicable federal laws and regulations existing or hereafter enacted or promulgated. In any event, the Operator will comply with the Toxic Substances Control Act of 1976, as amended (15 USC 2601, et seq.) with regard to any toxic substances that are used, generated by or stored on the ROW or on facilities authorized under this ROW grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 will be reported as required by the CERCLA, Section 102b. A copy of any report required or requested by any federal agency or state government as a result of a reportable release or spill of any toxic substances will be furnished to the AO concurrent with the filing of the reports to the involved federal agency or state government.

Water Quality

28. Provide for erosion-resistant surface drainage by adding necessary drainage facilities and prior to rain or snow events. When erosion in disturbed areas is anticipated, sediment barriers will be constructed to slow runoff, allow deposition of sediment, and prevent it from leaving the site.
29. If erosion features such as rilling, gullying, piping and mass wasting occur along the pipeline ROW at any time in the future these erosion features will be addressed immediately after observation by contacting the AO and submitting a reclamation plan with BMPs to address the erosion problems.
30. Locate culverts or drainage dips (water breaks) to avoid discharge onto unstable terrain such as headwalls or slumps. Provide adequate spacing of these drainage features to avoid accumulation of water in ditches or road surfaces. Monitor culvert installations to ensure proper placement and adequate armoring of inlets and outlets. Patrol areas susceptible to road or watershed damage during periods of high runoff.
31. Keep road inlet and outlet ditches, catchbasins, and culverts free of obstructions, particularly before and during spring runoff. Routine machine-cleaning of ditches will be kept to a minimum during wet weather. Leave the disturbed area in a condition that provides drainage with no additional maintenance.
32. The new access roads will be built and maintained to BLM Manual Section 9113 standards for road shape and drainage features. Culverts and waterbars will be installed according to 9113 standards and sized for the 10-year storm event with no static head and to pass a 25-year event without failing.
33. For the access road and the pad, the Operator will include via Sundry notice a detailed drainage plan including any BMPs that will be installed for the Operator's stormwater

management plan. This plan will be reviewed by the WRFO Hydrologist and approved by the AO before construction. The plan will describe:

- Construction methods planned for addressing on-site erosion to meet the Operator's stormwater discharge permit requirements.
- Soil analysis indicating the gravel will not be required to provide an all-weather surface for this access road or design specification and source of gravel to make this an all-weather access road needed for winter drilling.
- Locations for implementing methods for stabilizing disturbed areas after drilling and proposed maintenance. This description of stabilization methods will include seed mix, seeding rate, and method for mulching and stabilizing (i.e., erosion fabric, tackifier or other method).
- Culverts, low-water crossings, and/or water dips with the sizing and placement noted.

Water Rights

34. An estimate of the volumes of water that will be used for construction, drilling, completion, fracing, dust abatement, and the final source of drilling waters will be provided to the WRFO hydrologist before drilling begins.

Forest Management

35. All trees removed in the process of construction will be purchased from the BLM. The trees will be cut at a maximum stump height of 6 inches and disposed of by one of the following methods:
36. Purchased trees could be removed from federal land for resale or private use.
37. The stockpiled ground cover will be evenly distributed over the disturbed areas not to exceed 20 percent total ground cover for woody debris. The recommended seed mix to be used on all disturbed areas will be determined by the WRFO. The dirt contractor will be provided with an approved copy of the surface use plan.
38. Vegetative material and topsoil will be stockpiled and used for reclamation. All cut and fill slopes will be revegetated immediately after construction with the seed mixture(s) specified in the Conditions of Approval.
39. A hydro-ax or other mulching type machine could be used to remove the trees. The machines are capable of shredding trees up to 12 inches in diameter and 15 feet tall as well as mowing brush like a conventional brush beater. It generally leaves small branches and pieces of wood from pencil size up to bowling ball size and the mulch is evenly scattered across the surface. This would effectively breakdown the woody fuel and scatters the debris thereby eliminating any hazardous fuel load adjacent to the new road and well pad. If this type of tree removal is used, enough vegetation will be stock piled to adequately cover 20% of the surface for the well pad and stock pile the material adjacent to the top soil stock pile. Additionally, retain enough trees which are limbed and have root wads intact to adequately cover 20% of the surface for the pipeline disturbance. Material brought back onto the pipeline r-o-w should be evenly scattered, so as to not create jackpots of fuel.

Reclamation

40. A Reclamation Status Report will be submitted to the WRFO biannually for all actions that require disturbance of surface soils on BLM-administered lands as a result of the %

Action. Actions may include, but are not limited to, well pad and road construction, construction of ancillary facilities, or power line and pipeline construction. The Reclamation Status Report will be submitted by 15 April and 15 August of each calendar year, and will include the well number, API number, legal description, project description (e.g., well pad or pipeline), reclamation status (e.g., interim or final), whether the well pad or pipeline has been re-vegetated and/or re-contoured, date seeded, photos of the reclaimed site, estimate of acres seeded and seeding method (e.g., disk-plowed, drilled, or both). Internal and external review of this report and the process used to acquire the necessary information will be conducted annually, and new information or changes in the reporting process will be incorporated into the report. The Reclamation Status Report will be submitted electronically via email as a Microsoft Excel table to Natural Resource Specialist, Brett Smithers (brett_smithers@blm.gov).

41. In an attempt to track interim and final reclamation of federal actions related to the development of federal mineral resources, the Operator is asked to submit Geographic Information System (GIS) data to the White River Field Office (WRFO) for any post construction (i.e., "as-built") polygon feature that was included in the Application for Permit to Drill (APD) and associated with the Proposed Action. GIS polygon features may include, but are not limited to, constructed access roads, existing roads that were upgraded, pipeline corridors, and the well pad footprint. Geospatial data will be submitted as ArcView datasets (i.e., shapefiles or features), ArcInfo coverages, or as ArcView compatible data files (e.g., AutoCAD export .dwg files). All AutoCAD files must include the projection information and/or spatial (datum) reference to allow import into a spatially referenced GIS format. The preferred spatial reference for AutoCAD .dwg files is State Plane, Colorado North, NAD83, feet. GIS data will be submitted electronically to BLM, WRFO Natural Resource Specialist, Brett Smithers (brett_smithers@blm.gov; Phone: [970] 878-3818) using the 1983 Geographic Coordinate System (NAD 83 datum). These data will be submitted within 24 hours from the time when construction-related activities have ended for all geographic features associated with the Proposed Action. If the Operator is unable to send the data electronically, the Operator will submit the data on compact disk(s) to:

    BLM, White River Field Office
    220 East Market Street
    Meeker, Colorado 81641
    Attn: Brett Smithers

    If for any reason the location or orientation of the geographic feature associated with the Proposed Action changes, the Operator is asked to submit updated GIS data to BLM, WRFO within 7 days of the change, and this information should be submitted via Sundry Notice.

Wetlands and Riparian

42. Install and maintain erosion control structures and bank stabilization to minimize potential for sediment runoff into surface waters or drainages.
43. Prohibit storage of hazardous materials, chemicals, fuels, lubricating oils, concrete coating, and refueling activities within 200 feet of wetland or riparian areas.

44. Minimizing soil compaction and furrowing by using mats or wide tire/low ground pressure equipment for construction activities within riparian zones (if necessary).
45. Completing all construction activities in riparian area during no-flow period.
46. Limiting grading, topsoil segregation, and excavation to the area immediately over the trench line and directly within the footprint of the well pad to avoid excessive disruption of soils and the native seed and rootstock within the soils.
47. Performing routine daily inspections on equipment and vehicles to identify leaks and initiate corrective actions.
48. Managing all soil materials such that erosion and sediment transport are minimized.
49. Revegetating disturbed areas with BLM-approved seed mixes as soon as practical following disturbance.

Vegetation

50. If construction/development occurs between April 15 and November 15, the Operator will be required to water or surface access roads to reduce airborne dust and damage to roadside vegetation communities.
51. The Operator will promptly revegetate all disturbed areas not necessary for production, including roadside and well pad cut and fill slopes, with a seed mix approved by the BLM. This may mean broadcast seeding and hand raking with Native Seed mixture #3 as presented below.

Species (Variety)	Pure Live Seed (PLS) pounds per acre
Western wheatgrass (Rosanna)	2
Bluebunch wheatgrass (Whitmar)	2
Thickspike wheatgrass (Critana)	1
Indian ricegrass (Rimrock)	2
Fourwing saltbush (Wytana)	1
Utah sweetvetch	1
Alternates: Needle-and-thread, globemallow	
TOTAL	**9.0**

52. All seed tags will be submitted to the designated NRS within 24 hours from the time the seeding activities have ended via Sundry Notice. The sundry will include the well or well pad number associated with the seeding activity, the name of the contractor that performed the work, his or her phone number, an estimate of the total acres seeded, and the date the seed was applied.
53. Revegetation will commence immediately after construction and will not be delayed until the following fall. Drill seeding is the preferred method of application. Debris will not be scattered on the pipeline until after seeding operations are completed.
54. The Operator will be responsible for excluding livestock grazing from all reclaimed portions of well pads. To eliminate livestock utilization of reclaimed areas prior to successful reclamation, a barbed wire fence built to BLM specifications will be constructed around all reclaimed portions of the well pad including cut and fill slopes immediately after interim reclamation is concluded (within 2 weeks) unless otherwise instructed by the BLM. A BLM specified cattleguard will be placed at the time of fence construction where the well access road bisects the fence line that surrounds the well pad's disturbance imprint. Once reclaimed plant species are fully established on disturbed

sites as determined by the BLM (e.g., Desired Plant Community, Public Land Health Standards), the fence and cattle guard will be completely removed by the applicant after a minimum of two growing seasons. This will allow for reclaimed plant species to establish without grazing pressure from livestock.

55. The Operator will be responsible for achieving a reclamation success rate for interim reclamation and final abandonment (on all disturbed areas associated with the well pad, pipeline, and access road) of sufficient vegetative ground cover from reclaimed plant species within three growing seasons after the application of seed. Additional reclamation efforts will be undertaken at the Operators expense. Reclamation achievement will be evaluated using the Public Land Health Standards that include indicators of rangeland health. Rehabilitation efforts will be repeated if it is concluded that the success rate is below an acceptable level as determined by the BLM.

Wildlife

56. Reserve pits will be appropriately designed, as shown in the BLM Gold Book, Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development to prevent access by persons, wildlife, or livestock. Fencing, netting, or other methods may be required in order to prevent access and mortality of birds and other animals.
57. The Operator will be responsible for implementing mitigation measures that minimize bird injuries or mortality as a result of contact with produced water or other toxic substances in the reserve pit. The most effective measure currently being used includes the use of netting to cover the pit. The use of plastic balls that float on the surface and reduce the area that might be perceived by waterfowl as a place to rest and/or forage has also been used in certain circumstances, with limited results. The use of plastic flagging has proven to be ineffective at deterring use by migratory waterfowl for foraging, resting or as a source of free water, and its use is strongly discouraged. The Operator will notify WRFO Natural Resource Specialist, Brett Smithers via Email (brett_smithers@blm.gov) or by phone ([970] 878-3818) of the method that will be used to prevent impacts to birds two weeks prior to the date when completion activities are expected to begin. In addition, the Operator will submit a Sundry Notice describing the proposed method used to deter use of migratory birds. The BLM-approved method will be applied within 24 hours after completion activities have begun. All lethal and non-lethal events that involve migratory birds will be reported to the Petroleum Engineer Technician immediately.
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    - To help monitor possible impacts to big game and raptors as result of drilling, completion, and well maintenance (i.e., work-over) activities, the Operator will notify the designated NRS the day the drilling rig moves on to the location and inform him or her of the move. In addition, the Operator will notify the designated NRS within 24 hours from the time the drilling rig moves off the location, when the completions rig moves on to the location and when the completion rig moves off the location. Well maintenance operations will also be reported to the designated NRS within 24 hours

from the time the work-over rig moves on to the location and when the work-over rig moves off the location.

Access and Transportation

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61. Post-construction restoration of unsurfaced roads to equal or better than conditions that existed before construction.

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    - Inform site personnel of fire prevention practices concerning smoking materials, welding, etc., and make hand tools available, including shovels and fire extinguishers, for fire control.
    - Furnish all motor vehicles and equipment with fire-extinguishing equipment and stage fire-fighting equipment and water tanks on-site in readily accessible areas.
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    - Construct defensible space as necessary and determine design criteria in coordination with BLM fire staff.
    - Perform all welding activities in areas where vegetation and other flammable materials have been removed.
    - Redistribute large, woody material salvaged during clearing operations on WRFO administered lands and disperse materials over the portion of the ROW from which the trees and brush were originally removed to meet fire management objectives (not to exceed 20 percent total ground cover for woody debris) and to provide wildlife habitat, seedling protection, and deter vehicular traffic.
    - Refer to the 2008 Northwest Colorado Fire Program Area Fire Management Plan for additional mitigation requirements.

Paleontological Resources

63. It is not necessary to monitor low sensitivity Holocene-age alluvium that is thicker than the depth of the proposed surface disturbance.
64. The permittee is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
65. If any paleontological resources are discovered as a result of operations under this authorization, the proponent or any of his agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days.
66. Within 10 days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.
67. If it becomes necessary to excavate into the underlying rock formation to construct the well pad access road(s), bury the well tie pipelines, level the well pads or excavate the reserve/blooie/cuttings pits an approved paleontologist shall be present to monitor work before such excavations begin and throughout the excavation process.

Rangeland Management

68. All roadside and well location cut and fill slopes will be revegetated immediately after construction with the BLM-approved seed mixture(s). Revegetation operations will start immediately following the completion of recontouring/dirt work operations.
69. Reserve pit fencing will comply with BLM specifications as described in the BLM Gold Book, Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development. Reserve pit fence specifications will be included as part of the Conditions of Approval.
70. If construction/development occurs between April 15 and November 15, the Operator will be required to treat surface roads with water to reduce airborne dust and damage to roadside vegetation communities.

Realty

71. Amendments to any existing ROWs will retain terms, conditions, and stipulations of the original grant.

Visual Resource Management

72. All permanent (on-site for 6 months or longer) structures, facilities, and equipment placed on-site will be painted Munsell Soil Color Chart Juniper Green or equivalent within six months of installation.

COMPLIANCE WITH LAWS & CONFORMANCE WITH THE LAND USE PLAN
This decision is in compliance with the Endangered Species Act and the National Historic Preservation Act. It is also in conformance with the 1997 White River Record of Decision/Approved Resource Management Plan.

PUBLIC INVOLVEMENT: Internal scoping was initiated when the project was presented to the White River Field Office (WRFO) interdisciplinary team on 4/24/2012. External scoping was conducted by posting this project on the WRFO's on-line National Environmental Policy Act (NEPA) register on 4/25/2012. No concerns or inquiries were received regarding this project as of 6/26/2012.

RATIONALE: Total surface disturbance is minimized because the proposed well pad is directly adjacent to an existing paved road in an existing field. There are no threatened and endangered species concerns. Drilling eight wells from one pad allows for gas development to occur with minimal surface disturbance.

ADMINISTRATIVE REMEDIES:
State Director Review
Under regulations addressed in 43 CFR 3165.3(b), any adversely affected party that contests a decision of the Authorized Officer may request an administrative review, before the State Director, either with or without oral presentation. Such request, including all supporting documentation, shall be filed in writing with the BLM Colorado State Office at 2850 Youngfield Street, Lakewood, Colorado 80215 within 20 business days of the date such decision was received or considered to have been received. Upon request and showing of good cause, an extension may be granted by the State Director. Such review shall include all factors or circumstances relevant to the particular case.

Appeal
Any party who is adversely affected by the decision of the State Director after State Director review, under 43 CFR 3165.3(b), of a decision may appeal that decision to the Interior Board of Land Appeals pursuant to the regulations set out in 43 CRF Part 4.

SIGNATURE OF AUTHORIZED OFFICIAL: Kent T. Walter
Field Manager

DATE SIGNED: 07/05/2012